

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CONNECTU LLC,

Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO SAVERIN,
DUSTIN MOSKOVITZ, ANDREW MCCOLLUM,
CHRISTOPHER HUGHES, and
THEFACEBOOK, INC.,

Defendants.

CIVIL ACTION NO. 1:04-cv-11923
(DPW)

District Judge Douglas P.
Woodlock

Magistrate Judge Robert B.
Collings

MARK ZUCKERBERG and
THEFACEBOOK, INC.,

Counterclaimants,

v.

CONNECTU LLC,

Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER
WINKLEVOSS, and DIVYA NARENDRA,

Additional Counterdefendants.

**ASSENTED-TO MOTION FOR LEAVE TO FILE REPLY TO DEFENDANTS'
OPPOSITIONS TO PLAINTIFF'S MOTION TO COMPEL THE
PRODUCTION OF DOCUMENTS IN RESPONSE TO PRODUCTION
REQUEST NOS. 42, 44-46, 70-71, 85-96, 98-105, 107-110, 113, AND 169**

Plaintiff ConnectU LLC hereby moves for leave to file a reply to Defendants' Oppositions to Plaintiff's Motion to Compel the Production of Documents in Response to Production Request Nos. 42, 44-46, 70-71, 85-96, 98-105, 107-110, 113, and 169 (attached hereto as Exhibit A).

As grounds for this motion, a reply brief is necessary to address new issues raised in Defendants' Oppositions (separate oppositions were filed by the Facebook Defendants and by Co-Defendant Saverin) and to clarify the record for the Court. New issues raised in the Oppositions are Defendants' new arguments regarding the relevance and breadth of Plaintiff's production requests and various erroneous statements in Defendants' oppositions that require correction.

Plaintiff's reply (Exhibit A) will clarify these issues and will assist the Court in ruling on Plaintiff's Motion to Compel the Production of Documents in Response to Production Request Nos. 42, 44-46, 70-71, 85-96, 98-105, 107-110, 113, and 169. The proposed Order granting this assented-to motion is attached as Exhibit B.

CERTIFICATION UNDER L.R. 7.1

Plaintiff's counsel hereby certifies under L.R. 7.1 that Troy Grabow, counsel for Plaintiff, conferred with Joshua Walker (counsel for the Facebook Defendants) and Dan Hampton (counsel for co-Defendant Saverin), and that they consent to this motion.

DATED: September 30, 2005

/s/ Troy E. Grabow
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